



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Bank Richmond, National Association
Charter Number: 23570

20 North 9th Street
Richmond, IN 47374-0000

Office of the Comptroller of the Currency

CENTRAL ILLINOIS & CENTRAL IND Field Office
Harris Center 3001 Research Road
Champaign, IL. 61822-1089

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of First Bank Richmond, National Association (FBR) with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X		
Needs to Improve		X	
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The overall geographic and borrower distribution for home mortgage and commercial loans reflects adequate dispersion to low- and moderate-income geographies and borrowers of different income levels.
- Community development lending activity was positively considered. The bank's overall responsiveness is good, given its size, lending capacity, and opportunities.
- Community development investments reflect poor responsiveness to the level of opportunities within the AA. Current period investments consist of charitable contributions that address social service needs to low- and moderate-income individuals and families, and aid in economic development.
- FBR demonstrates good responsiveness to the community development needs in the AA. The bank's delivery systems are accessible to low- and moderate-income geographies and to low- and moderate-income individuals.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

FBR is a community bank headquartered in Richmond, IN (Wayne County). Richmond is located in east central Indiana (IN) adjacent to the Ohio (OH) state line. It is approximately sixty-six miles east of Indianapolis, IN, ninety-two miles south of Fort Wayne, IN, sixty-three miles northwest of Cincinnati, OH, and forty miles west of Dayton, OH. Richmond is the county seat and is easily accessible at the intersection of I-70 and US 40.

FBR is an intrastate institution that serves all of Wayne County, IN and a small portion of Shelby County, IN. Wayne County is located in a non Metropolitan Statistical Area (MSA) and Shelby County is located in the Indianapolis, IN MSA, #26900. As of March 31, 2010, FBR had \$611 million in total assets.

In total, FBR has nine offices and eight deposit taking automatic teller machines (ATMs). The bank operates eight offices and seven ATMs in Wayne County, IN and one office and one ATM in Shelby County, IN. FBR has not opened or closed any branches during this evaluation period. They did, however, close two stand-alone ATMs in Wayne County, both of which were located in middle-income geographies.

FBR is wholly owned by Richmond Mutual Bancorporation, which is a three-bank holding company headquartered in Richmond, IN. Richmond Mutual also owns American Trust Federal Savings Bank in Peru, IN and Mutual Federal Savings Bank located in Sidney, OH. Richmond Mutual Bancorporation is wholly owned by First Mutual of Richmond, Inc., which is also headquartered in Richmond, IN. Total consolidated assets of First Mutual of Richmond, Inc. were \$858 million as of March 31, 2010. No merger or acquisition activity occurred during the evaluation period.

FBR is a full service lender who offers various loan and deposit products. The bank's primary lending focus is commercial loans followed by home mortgages. As of March 31, 2010, net loans and leases totaled \$489 million or 80 percent of total assets, and consisted of commercial and commercial real estate loans (50 percent), commercial leases (14 percent), residential real estate loans (28 percent), brokered second mortgages (5 percent), and consumer and other loans (3 percent).

There are no financial, legal or other factors, which would impede the bank's ability to meet the credit needs of the community it serves. As of March 31, 2010, FBR reported Tier 1 capital of \$56 million.

FBR was rated "Satisfactory" at its last CRA evaluation dated July 23, 2007.

From January 1, 2007 through December 31, 2009, the bank originated 1,840 loans totaling \$239 million. This includes 974 home mortgage loans (\$89 million), 824 small loans to businesses (\$145 million), and 42 small loans to farms (\$5 million).

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test is January 1, 2007 through December 31, 2009. The evaluation period for Community Development (CD) Loans and the Investment and Service Tests is July 23, 2007 through June 8, 2010.

Products included in FBR's lending test analysis are reportable home mortgage loans, small loans to businesses, small loans to farms, and CD loans. Loan products are weighted based on the distribution of "reported" loans by number and dollar.

We utilized 2008 Peer Data, the most recent data available, for home mortgage and small business to compare FBR's lending performance to other reporting lenders in the assessment areas. We also used deposit information, reported to the Federal Deposit Insurance Corporation annually, to determine the bank's deposit market share and market presence within its assessment area. The most recent deposit information available is as of June 30, 2009.

Data Integrity

The Community Reinvestment Act requires that banks of a specific asset size collect and maintain certain data regarding originations and purchases of mortgage loans, small business loans, and small farm loans. Although FBR does not meet the asset size specifications, they have chosen to collect data regarding their originations and purchases. As part of our evaluation, and to assess the accuracy of the bank's data, we conducted an independent test of the data that FBR collected for home mortgage, small business, and small farm loan products. We determined the bank's 2007, 2008, and 2009 loan data to be substantially accurate and it is used without exception in this evaluation.

Selection of Areas for Full-Scope Review

FBR has two assessment areas (AAs) consisting of all of Wayne County, IN and a small portion of Shelby County, IN. The Wayne County Non-MSA AA is the bank's primary assessment area, where the main office and most branches are located. The county includes seventeen geographies (one low-income, three moderate-income, twelve middle-income, and one upper-income census tracts). The bank has the largest deposit market share among ten banks in Wayne County, at 37.47%. Full-scope examination procedures will be performed for this assessment area.

The Shelby County MSA AA consists of four census tracts covering the city of Shelbyville, IN. The assessment area includes three middle-income and one moderate-income census tracts. The bank's one branch office is located in a grocery store, and deposit and loan activity in this area is minimal. The branch represents only six percent of the bank's deposits and eleven percent of the bank's branches. Additionally, only one percent of loan originations during this evaluation period were originated in the Shelby County MSA AA. The bank ranks seventh of

ten banks in deposit market share in Shelby County, at 3.21percent. Only limited scope examination procedures will be performed for this assessment area.

Ratings

The bank's overall rating is based on the bank's performance in the Wayne County AA.

When determining conclusions for the Lending Test, mortgage loans and small loans to businesses received equal weight due to the volume of loans generated during the evaluation period. These loans were weighted heavier than small loans to farms.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Wayne County Non-MSA AA is adequate.

Lending Activity

The volume of lending in the Wayne County Non-MSA AA is good in relation to credit needs and the bank's deposit market share. FBR has the highest market share in deposits within Wayne County. In addition, FBR ranked first in market share for small loans to businesses, home refinance, home improvement, and multi-family loans. FBR ranked second in market share for home purchase loans and fifth for small loans to farms. Refer to Table 1, Lending Volume, in appendix C for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of FBR's home mortgage loans and loans to businesses and farms in low- and moderate-income geographies is adequate, given the bank's overall market share, area demographics, and lending strategy. Our analysis reflected lending in a majority of the census tracts in the AAs.

Home mortgage and small loans to businesses were weighted heavier than small loans to farms. Only forty-two small loans to farms were made during the evaluation period.

A majority of FBR's originations were made within their AAs. In addition, our analysis reflected lending in a majority of the census tracts in the AAs. There were no unexplained conspicuous gaps identified.

Home Mortgage Loans

The geographic distribution of home mortgage loans in the low- and moderate-income geographies reflects an adequate distribution among the different income-level geographies. FBR holds the highest market share for home mortgage lending among a large number of financial institutions in the Wayne County Non-MSA AA.

Home refinance loans were weighted heavier than home purchase, home improvement, and multifamily loans. Five hundred and fifty-six of the nine hundred sixty-five home mortgage loans originated were home refinance loans.

The geographic distribution of home purchase loans is good. The geographic distribution of home purchase loans in the low-income geographies is good and the geographic distribution of home purchase loans in moderate-income geographies is adequate. The percentage of home purchase loans (3.52 percent) slightly exceeds the percentage of owner-occupied units (2.99 percent) in the low income geographies and is considered to be good. The percentage of

home purchase loans (12.90 percent) is below the percentage of owner occupied units (17.00 percent) in moderate-income geographies and is considered to be adequate. In addition, the bank's market share within the low- and moderate-income geographies for home purchase loans (24.00 and 20.43 percent) is above the bank's overall market share for home purchase loans within the Wayne County Non-MSA AA. The bank ranks second with an overall market share of 17.83 percent in the Wayne County Non-MSA AA for home purchase loans.

The geographic distribution of home improvement loans is adequate. The percentage of loans in low-income geographies (1.54 percent) is slightly below the percentage of owner-occupied units (2.99 percent) in those geographies and is considered to be adequate. The percentage of loans in moderate-income geographies (9.23 percent) is below the percentage of owner occupied units in those geographies (17.00 percent), and is considered to be poor. The bank's market share for home improvement loans in the low-income geographies is zero, while the bank's market share in the moderate-income geographies (33.33 percent) is above the overall market share. FBR ranks first among financial institutions in the Wayne County Non-MSA AA for home improvement loans with an overall market share of 24.51 percent.

The geographic distribution of home refinance loans is adequate. The percentage of bank loans in low-income geographies (2.34 percent) is slightly below the percent of owner occupied units (2.99 percent) in those geographies and is considered to be adequate. The percentage of bank loans in moderate-income geographies (11.33 percent) is also lower than the percentage of owner occupied units in those geographies and is also considered to be adequate. The bank's market share for home refinance loans in the low-income geographies (16.00 percent) is below the bank's overall market share for home refinance loans. The bank's market share for home refinance loans in the moderate-income geographies (20.00 percent) is slightly higher than the bank's overall market share for home refinance loans. FBR ranks first among financial institutions in the Wayne County Non-MSA AA for refinancing with a market share of 19.38 percent.

The geographic distribution of multifamily loans is adequate. The percentage of bank loans in low-income geographies (66.67 percent) exceeds the percent of owner occupied units (19.89 percent) in those geographies and is considered to be excellent. The percentage of bank loans made to moderate-income geographies (zero percent) is significantly lower than the percent of owner occupied units (20.75 percent) in those geographies and is considered to be very poor. The bank's market share for multifamily loans in the low-income geographies (100 percent) is equal to the bank's overall market share for multifamily loans. The bank's market share for multifamily loans in the moderate-income geographies zero. FBR ranks first among financial institutions in the Wayne County Non-MSA AA for multifamily loans with one hundred percent of the market share.

Refer to Tables 2, 3, 4, and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The geographic distribution of small loans to businesses in low- and moderate-income geographies reflects excellent distribution among the different income-level geographies. Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses in low- and moderate-income geographies is excellent. The percent of small loans to businesses in low- and moderate-income geographies (19.12 percent and 26.31 percent) exceeds the percentage of businesses in those geographies (13.80 and 15.90 percent). Additionally, the bank's market share in low- and moderate-income geographies (30.19 percent and 21.60 percent) exceeds the bank's overall market share. FBR ranks first in overall market share for small loans to businesses in the Wayne County Non-MSA AA with 17.78 percent.

Small Loans to Farms

The geographic distribution of small loans to farms in low- and moderate-income geographies reflects poor distribution among the different income-level geographies. Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms in low-income geographies is adequate. Although the bank made no small loans to farms in the low-income geographies, less than one percent of the farms in the AA are located in the low-income geographies. The bank also made no loans in the moderate-income geographies even though 5.90 percent of the farms in the AA are located in moderate-income geographies. This distribution in the moderate-income geographies is considered to be very poor. Additionally, the bank's market share in low- and moderate-income geographies is zero, compared to an overall market share of 7.32 percent. FBR ranks fifth in overall market share for small loans to farms in the Wayne County Non-MSA AA.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps in low- and moderate-income areas. We did not identify any unexplained conspicuous lending gaps in the Wayne County Non-MSA AA.

Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. A majority of the bank's loans by number (56 percent) are inside its assessment areas. By product type, 84 percent of small business loans, 53 percent of mortgage loans, and 63 percent of small farm loans are originated to borrowers inside the bank's assessment areas. We viewed this as a positive characteristic in our analysis of lending performance.

Number of Loans					Dollars of Loans (000's)				
Inside		Outside		Total	Inside		Outside		Total
#	%	#	%		\$	%	\$	%	
344	29.53%	821	70.47%	1,165	\$28,233	40.67%	\$41,188	59.33%	\$69,421
563	60.41%	369	39.59%	932	\$58,649	66.45%	\$29,607	33.55%	\$88,256
67	49.63%	68	50.37%	135	\$2,241	50.15%	\$2,228	49.85%	\$4,469
824	84.17%	155	15.83%	979	\$144,717	79.76%	\$36,719	20.24%	\$181,436
42	62.69%	25	37.31%	67	\$5,811	59.40%	\$3,972	40.60%	\$9,783
1,840	56.13%	1,438	43.87%	3,278	\$239,651	67.82%	\$113,714	32.18%	\$353,365

Distribution of Loans by Income Level of the Borrower

FBR has adequate borrower distribution to borrowers of different income levels and to businesses and farms of different sizes, considering the poverty rate of 8.46 percent of families within the AA and the high unemployment rate of 11.80 percent. Home mortgage loans and small loans to businesses received equal weight, based on the volume of loans (by dollar and number) that were originated during the evaluation period. These loans were weighed heavier than small loans to farms.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is adequate. Home refinance loans were weighed heavier than home purchase and home improvement loans, based on origination volumes. Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution for home purchase loans is good. The percentage of loans made to low-income borrowers (12.82 percent) is lower than the percentage of low-income families (20.58 percent). Although the percent of loans made is lower than the comparator, it is considered to be adequate given the poverty level and above average unemployment in the Wayne County Non-MSA AA. With income below the poverty level, it is difficult to afford home ownership. The percentage of loans made to moderate-income borrowers (23.72 percent) exceeds the percentage of moderate-income families (20.95 percent) in the AA and is considered to be excellent. FBR's market share of home purchase loans to low-income borrowers (15.48 percent) is slightly lower than the bank's overall market share. FBR's market share of home purchase loans to moderate-income borrowers (19.23 percent) is above the bank's overall market share of home purchase loans. FBR ranks second in the overall market share for home purchase loans as compared to other financial institutions in the Wayne County Non-MSA AA with an overall market share of 17.83 percent.

The borrower distribution for home improvement loans is adequate. The percentage of home improvement loans made to low-income borrowers (8.93 percent) is lower than the percentage of low-income families (20.58 percent). This distribution is poor; however, it is important to

realize the poverty rate of eight percent of AA families and the above average unemployment rate in the Wayne County Non-MSA AA. The percentage of home improvement loans made to moderate-income borrowers (23.21 percent) is higher than the percentage of moderate-income families (20.95 percent); therefore, performance is considered to be excellent. FBR's market share of home improvement loans to low- and moderate-income borrowers (15.38 and 16.00 percent) is lower than the bank's overall market share. The bank ranks first in market share for home improvement loans, with 24.51 percent of the overall market share, as compared to other financial institutions in the Wayne County Non-MSA AA.

The borrower distribution for home refinance loans is adequate. The percentage of home refinance loans made to low-income borrowers (7.63 percent) is lower than the percentage of low-income families (20.58 percent) in the AA. Therefore, distribution to low-income borrowers is considered poor. As previously mentioned, mitigating factors to be considered include the poverty and unemployment rates. The percentage of home refinance loans to moderate income borrowers (18.20 percent) is slightly lower than the percentage of moderate-income families (20.95 percent) in the AA. Distribution of home refinance loans to moderate-income borrowers is adequate. FBR's percentage of market share in low- and moderate-income geographies (13.10 and 15.00 percent) is less than the bank's overall market share. The bank ranks first in market share for home refinance loans, with 19.38 percent of the overall market share, as compared to other financial institutions in the Wayne County Non-MSA AA.

Small Loans to Businesses

The borrower distribution of small loans to businesses is adequate. Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The percent of loans to businesses with revenues of \$1 million or less (63.82 percent) is lower than the percentage of businesses with revenues of \$1 million or less (73.55 percent) in the Wayne County Non-MSA AA. However, FBR's market share to businesses with revenues of \$1 million or less (28.16 percent) is greater than the overall market share (17.78 percent). The bank ranks first in overall market share for small loans to businesses as compared to other banks within the Wayne County Non-MSA AA.

Small Loans to Farms

The borrower distribution of small loans to farms is adequate. Refer to Table 12 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The percent of loans to farms with revenues of \$1 million or less (85.71 percent) is lower than the percentage of farms with revenues of \$1 million or less (99.02 percent) in the Wayne County Non-MSA AA. However, FBR's market share to farms with revenues of \$1 million or less (10.19 percent) is greater than the overall market share (7.32 percent). The bank ranks fifth in overall market share for small loans to farms as compared to other banks within the Wayne County Non-MSA AA.

Community Development Lending

Community development lending had a positive effect on the Lending Test conclusions.

Refer to Table 1, Lending Volume, in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Community development lending in the Wayne County Non-MSA AA is good, given the volume of loans and responsiveness to the area's identified credit needs of affordable housing. Community development lending had a positive impact on the bank's overall lending performance. The bank originated seven community development loans totaling \$1.2 million or two percent of Tier 1 capital during the evaluation period. This included five individual loans totaling approximately \$805 thousand to Habitat for Humanity to provide financing for lot purchases. The lots were used to build single family residences for low- and moderate-income individuals and families. FBR also made two loans to the Fountain City Lions Club Senior Housing Project totaling \$372 thousand. These loans provided funding for the construction of a 12 unit low-income senior housing facility in Fountain City, IN.

Additionally, outside of the AA, FBR did provide \$435 thousand to a non-profit organization. This loan provided permanent financing for a newly constructed sixteen unit low-income apartment facility in Connersville, IN. Connersville is located in a neighboring county about twenty-five miles southwest of Richmond, IN.

Product Innovation and Flexibility

Product flexibility had a positive impact on the Lending Test conclusions for the Wayne County AA. During 2007 and 2008, FBR participated in the "First Time Homebuyers" and "Down Payment Assistance" programs available through the Indiana Housing and Community Development Authority (IHCDA). These programs provide increased flexibility regarding down payments (with assistance), loan to values, and below market rates for low- to moderate-income borrowers. FBR originated fifty-five loans totaling approximately \$4 million under the IHCDA program. (These numbers are included in Table 1 - Home Mortgage – Wayne County AA.) Additionally, FBR offers loans through Fannie Mae, which provide lower rates, minimum down payments, and credit enhancements of private mortgage insurance (PMI). None of FBR's lending programs are considered to be innovative.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Lending Test in the Shelby County-Indy MSA AA is weaker than the bank's overall performance. Refer to Tables 1-13 in Appendix C for the facts and data that support these conclusions.

Performance in the limited-scope AA for home mortgage loans is weaker due to the limited loan activity resulting in less favorable penetration of moderate-income tracts (there are no

low-income geographies in this AA) and weaker combined lending to low- and moderate-income individuals. Lending performance for small loans to businesses; however, is stronger and the lending performance for small loans to farms is significantly weaker as compared to lending in the Wayne County Non-MSA AA. FBR does not have a significant presence in the Shelby County-Indy MSA AA and ranks 59th among 130 financial institutions with less than one percent of the market share. FBR has zero percent of the market share for home purchase, home refinances, and multi-family loans, and nine percent of the market share for home improvement loans. Additionally, the bank has less than one percent of the market share for small loans to businesses and zero percent of the market for small loans to farms in this AA. The bank only originated nine mortgage loans, three small loans to businesses, and no small loans to farms in the Shelby County-Indy MSA AA during the evaluation period.

The bank made no community development loans in the Shelby County-Indy MSA AA during this evaluation period. Performance was; therefore, weaker than performance in the Wayne County Non-MSA AA.

The volume of lending in the limited-scope AA is not significant in relation to the volume of lending in the Wayne County Non-MSA AA. Therefore, this weaker performance did not impact the bank's overall Lending Test performance Rating.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated Needs to Improve, based on a full-scope review of the bank's performance in the Wayne County Non-MSA AA. Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The number and dollar volume of FBRs qualified investments is poor based on the opportunities to make investments in the Wayne County Non-MSA AA and identified assessment area need of affordable housing. The bank provided sixteen qualified investments totaling approximately \$189 thousand or .34% of Tier 1 capital during the evaluation period. The bank's qualified investments consist of various charitable contributions made to community development services that supply food, shelter, and clothing to low-and-moderate income individuals and the homeless, to provide educational opportunities and rehabilitation services for homeless and at-risk children, and to assist in providing economic development.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Investment Test in the Shelby County-Indy MSA AA is not inconsistent with the bank's overall performance. Refer to Table 14 in Appendix C for the facts and data that support this conclusion. Performance in the limited-scope AA did not impact the bank's overall investment performance.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated High Satisfactory, based on a full-scope review of the bank's performance in the Wayne County Non-MSA AA.

Retail Banking Services

Accessibility to the bank's delivery systems in the AA is considered good. FBR's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the AA. The level of community development services provided by bank staff is satisfactory. Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The Wayne County Non-MSA AA has one low-income geography and three moderate-income geographies. There is one FBR office and one ATM in the low-income geography. The percent of branches (12.50 percent) and ATMs (14.29 percent) in that geography exceeds the percent of population (6.26 percent) residing in the low-income geography. There are no offices in the moderate-income geographies, although approximately 19 percent of the population resides in these geographies. However, there are six branches and six ATMs that are located in tracts adjacent to the three moderate-income geographies that are accessible to the low- and moderate-income population.

FBR also offers alternative delivery systems that are available to all customers and can help facilitate availability to all geographies and income levels in its AA. These include access to banking services provided through 24-hour, seven days a week internet banking, and telephone banking options. Internet and telephone banking allow the customer free access to most of the routine services the bank offers, including obtaining account balances, bill pay, transferring funds between accounts, and verifying if checks have cleared. Additional delivery services include direct deposit, remote deposit capture, debit cards, and banking by mail.

FBR has not opened or closed any branches in the assessment area during the evaluation period. The bank did close two stand-alone ATMs that were located in middle-income census tracts in Wayne County. One ATM was closed because it was located in a supermarket which closed. The other ATM was closed due to its close proximity to FBR's Northside location, limited customer usage, and cost of operation.

There is no material differences in services offered at branch locations. All of the branches, except one, are full-service. The one limited-service branch is a drive-up facility located within four blocks of the main office. Banking hours do not vary in a way that inconveniences its assessment area, particularly the low- and moderate-income geographies or low- to moderate-income individuals. Drive-up facilities offer extended hours on Friday and Saturday, and ATMs offer 24-hour service. One branch is open on Sunday afternoon.

The bank does not monitor the use of their alternative delivery systems by low- and moderate-income individuals. As a result, we did not place significant weight on these systems to reach conclusions on FBR's performance under the Service Test.

Community Development Services

FBR's performance in providing Community Development (CD) services to its AA is good. Six bank employees provided their financial expertise to nine organizations during the evaluation period. Five organizations provide affordable housing and services to low- and moderate-income individuals and families, and four organizations promote small business development and revitalization of low- and moderate-income geographies. Employees provided financial assistance through fundraising, budget preparation and evaluation, grant assistance, and investment advice. Others served as members of loan and finance committees, or spoke/instructed to improve financial literacy among low- and moderate-income individuals. Major highlights of CD service activities in the AA during the evaluation period include the following:

The Fountain City Lions Club received an Affordable Housing Program Award through the Federal Home Loan Bank of Indianapolis for \$350,000. FBR was the sponsor bank for this project. The Lions club built a 12 unit low income senior housing facility in Fountain City, IN. The project provides housing for low- and moderate-income individuals and families.

FBR teamed with the Federal Home Loan Bank (FHLB) of Indianapolis, IN by reviewing and approving Affordable Housing Grants awarded by the FHLB. FBR also worked with the Wayne County Revolving Loan Fund and the City of Richmond Revolving Loan Fund, and provided assistance in reviewing loans for business startup and expansion.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Service Test in the Shelby County-Indy MSA AA is weaker than the bank's overall performance. There is no low-income and only one moderate-income geography in this AA. The bank's one branch and ATM is located in a middle-income geography. This middle-income geography is contiguous with the AA's one moderate-income geography. Banking hours and services are consistent with those offered in the Wayne County Non-MSA AA. FBR provided no community development services in this AA during the evaluation period. FBR has less than one percent of the lending market share and only three percent of the deposit market share in the Shelby County-Indy MSA AA. Therefore, performance in the limited-scope AA did not impact the bank's overall service test rating. Refer to Table 1 and 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): January 1, 2007 to December 31, 2009 Investment and Service Tests and CD Loans: July 23, 2007 to June 8, 2010	
Financial Institution	Products Reviewed	
First Bank Richmond, National Association	Small Business, Home Mortgage, Small Farm, and Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wayne County Non-MSA AA Shelby County-Indy MSA AA	Full Scope Limited Scope	

Appendix B: Market Profiles for Full-Scope Areas

Wayne County Non-MSA AA

Demographic Information for Full-Scope Area: Wayne County Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	17	5.88	17.65	70.59	5.88	0.00
Population by Geography	71,097	6.36	18.84	66.41	8.39	0.00
Owner-Occupied Housing by Geography	19,564	2.99	17.00	70.99	9.02	0.00
Businesses by Geography	4,704	13.80	15.90	56.82	13.48	0.00
Farms by Geography	305	0.98	5.90	89.18	3.94	0.00
Family Distribution by Income Level	19,340	20.58	20.95	23.67	34.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,033	9.46	25.23	59.80	5.51	0.00
Median Family Income		45,666	Median Housing Value	79,563		
HUD Adjusted Median Family Income for 2009		55,500	Unemployment Rate	3.33%		
Households Below the Poverty Level		11%	(2000 US Census)			

(*) The NA category consists of geographies that have not been assigned an income classification. Source: 2000 U.S. Census, and 2009 HUD updated MFI.

FBR operates eight branches and seven ATMs within the bank's Wayne County Non-MSA AA. The Wayne County Non-MSA AA includes all of Wayne County, which consists of seventeen contiguous census tracts. The AA includes one low-income, three moderate-income, twelve middle-income, and one upper-income census tracts. The AA's one low-income geography is in the center of Richmond, IN and the moderate-income geographies are to the south side and the northwest side of Richmond. Richmond has an urban enterprise zone established in the low-income geography and an adjoining moderate-income geography. The assessment area complies with the regulation and does not arbitrarily exclude any low- to moderate-income areas.

FBR ranks first in deposit market share among ten financial institutions operating in its Wayne County Non-MSA AA. These financial institutions consist of large regional banks, large local banks, and small community banks. A local credit union provides additional competition.

As of June 30, 2009, FBR's deposits totaled \$427 million and represented approximately 37 percent of the market. Major competitors include: US Bank, NA with 18 percent of the market, JP Morgan Chase with 11 percent of the market, West End Bank and Trust with 11 percent of the market, and Wayne Bank and Trust with nine percent of the market.

Economic indicators show that the economy in Wayne County is continuing to decline due to a high unemployment rate, loss of manufacturing jobs, population decline, and the overall

national economy. December 2009 showed an unemployment rate of 11.8% percent in Wayne County. This unemployment rate is higher than the December 2009 national rate of 9.7 percent and the state rate of 9.8 percent.

Manufacturing, which was the primary industry in Wayne County, has been replaced by services, retail trade, non-classified establishments and finance, insurance, and real estate. The total number of businesses located within the AA is 4,427. Small businesses (gross annual revenues of less than \$1 million) make up 63 percent of the businesses in the AA. Some of the major employers in the AA include: Reid Hospital, Beldon Wire and Cable Company, Dunn Center (Social Services), Richmond Community Schools, Richmond State Hospital, City of Richmond, Mosey Mfg, Earlham College, Wayne County, Primex Plastics, Color Box, Indiana State University, Landis Plastics, Tom Raper RVs, Silgan Closures, Achieva Resources (Social Services), and Hill's Pet Nutrition.

According to a recent report produced by a local realtor, the health of existing local industries appears to be weakening. Masterbrand Cabinets closed in August 2008, laying off 275 persons, and Marvel Industries closed in October 2008 laying off an additional 125 persons. Beldon Wire and Cable have experienced two layoffs recently, which have reduced their employment by approximately 200.

In spite of economic and population issues, manufacturers are still finding benefits for expanding in Wayne County, in particular the workforce. In 2008, DOT Foods opened a distribution warehouse in the new Gateway Industrial Park and Really Cool Foods completed construction of a plant in the same park. Really Cool expects to eventually employ one thousand people. Jason Finishing Group, an international industrial abrasives maker, located a manufacturing line from North Carolina to their plant in Wayne County in late 2009, creating nearly fifty new jobs by 2012 and making a \$550 thousand investment. CIT, a materials handling and product machine manufacturer producing automotive component parts, was awarded a three-year contract to produce physical therapy tables for the health care industry. Likewise, J.M. Hutton, a casket manufacturer, is utilizing the skills of their existing workforce to also produce truck and airplane parts. Their \$1 million investment in new equipment retained nearly 100 jobs and created some new jobs for Wayne County.

As noted, the area has also seen significant growth in the hospitality industry. A Hampton Inn was constructed near the US40 – I-70 interchange. New restaurants in Richmond, IN include IHOP, Buffalo Wings and Rings, Skyline Chili, Starbucks, BW3's, and Galo's Italian Village. Additionally, a Walgreens, Frisch's, Starbucks, Kohls, and Menards have been constructed in a relatively new development in Richmond (Richmond Village).

Despite this activity, no significant improvements to the economy in Wayne County are expected to occur. With the exception of the commercial retail sector, property values are poor and are likely to continue to remain stagnant to declining in at least the near term. Residential property values have been declining since 2007 and this trend is expected to continue through 2010. Local and economic conditions are causing diminished business in the automobile and hospitality sectors, including restaurants, hotels, and motels.

Various opportunities exist in the AA for the bank to participate in community development, affordable housing, and outreach programs. Based on interviews performed during this evaluation period with an affordable housing organization and an economic development

corporation, we noted that assessment area needs include more affordable housing, grant funding for housing rehabilitation, innovative community development programs, homeownership counseling, and board involvement.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME 2009		Geography: RICHMOND 2010 AAS						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31,				
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Wayne County Non-MSA A	99.35	965	88,424	821	144,537	42	5,811	7	1,177	1,835	239,949	37.47
Limited Review:												
Shelby County - Indy N	0.65	9	699	3	180	0	0	0	0	12	879	3.21

* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 23, 2007 to June 8, 2010.

*** Deposit Data as of May 19, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: First Bank Richmond

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2009		Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	341	99.71	2.99	3.52	17.00	12.90	70.99	65.40	9.02	18.18	17.83	24.00	20.43	16.46	19.18
Limited Review:															
Shelby County - Indy MSA AA	1	0.29	0.00	0.00	30.43	0.00	69.57	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: First Bank Richmond

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2009		Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	65	97.01	2.99	1.54	17.00	9.23	70.99	75.38	9.02	13.85	24.51	0.00	33.33	20.00	54.55
Limited Review:															
Shelby County - Indy MSA AA	2	2.99	0.00	0.00	30.43	100.00	69.57	0.00	0.00	0.00	9.09	0.00	12.50	0.00	0.00

* Based on 2008 Peer Mortgage Data (Eastern)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: First Bank Richmond

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2009		Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	556	98.93	2.99	2.34	17.00	11.33	70.99	69.06	9.02	17.27	19.38	16.00	20.00	18.84	23.94
Limited Review:															
Shelby County - Indy MSA AA	6	1.07	0.00	0.00	30.43	16.67	69.57	83.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: First Bank Richmond

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY DECEMBER 31, 2009		Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	3	100.00	19.89	66.67	20.75	0.00	33.29	33.33	26.07	0.00	100.00	100.00	0.00	100.00	0.00
Limited Review:															
Shelby Count - Indy MSA AA	0	0.00	0.00	0.00	29.68	0.00	70.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: First Bank Richmond

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2009			Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	821	99.64	13.80	19.12	15.90	26.31	56.82	41.29	13.48	13.28	17.78	30.19	21.60	13.45	21.24
Limited Review:															
Shelby County - Indy MSA AA	3	0.36	0.00	0.00	39.25	100.00	60.75	0.00	0.00	0.00	0.09	0.00	0.00	0.10	0.00

* Based on 2008 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2009).

Institution ID: First Bank Richmond

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2009		Geography: RICHMOND 2010 AAS										Evaluation Period: JANUARY 1, 2007 TO				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Wayne County Non MSA AA	42	100.00	0.98	0.00	5.90	0.00	89.18	100.00	3.94	0.00	7.32	0.00	0.00	7.64	0.00	
Limited Review:																
Shelby County - Indy MSA AA	0	0.00	0.00	0.00	19.57	0.00	80.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2009).

Institution ID: First Bank Richmond

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE DECEMBER 31, 2009		Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total	% Families ^{***}	% BANK Loans ^{***}	% Families ¹	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{**}	% BANK Loans ^{***}	Over all	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	341	99.71	20.58	12.82	20.95	23.72	23.67	22.76	34.80	40.71	17.83	15.48	19.23	18.00	22.42
Limited Review:															
Shelby Count - Indy MSA AA	1	0.29	24.15	0.00	22.37	0.00	26.28	0.00	27.19	100.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2008 Peer Mortgage Data (Eastern)

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 8.5% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2009		Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	65	97.01	20.58	8.93	20.95	23.21	23.67	23.21	34.80	44.64	24.51	15.38	16.00	23.81	24.32
Limited Review:															
Shelby County - Indy MSA AA	2	2.99	24.15	100.00	22.37	0.00	26.28	0.00	27.19	0.00	9.52	40.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Eastern)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 13.4% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2009			Geography: RICHMOND 2010 AAS								Evaluation Period: JANUARY 1, 2007 TO				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans**	Overall	Low	Mod	Mid	Upp
Full Review:															
Wayne County Non MSA AA	556	98.93	20.58	7.63	20.95	18.20	23.67	24.85	34.80	49.32	19.38	13.10	15.00	18.22	27.64
Limited Review:															
Shelby County - Indy MSA AA	6	1.07	24.15	40.00	22.37	20.00	26.28	20.00	27.19	20.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 8.2% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2009			Geography: RICHMOND 2010 AAS				Evaluation Period: JANUARY 1, 2007 TO		
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wayne County Non MSA AA	821	99.64	73.55	63.82	53.71	23.63	22.66	17.78	28.16
Limited Review:									
Shelby County - Indy MSA AA	3	0.36	71.35	100.00	100.00	0.00	0.00	0.09	0.42

* Based on 2008 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.36% of small loans to businesses originated and purchased by the bank.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2009			Geography: RICHMOND 2010 AAS				Evaluation Period: JANUARY 1, 2007 TO		
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of *** Farms	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Wayne County Non MSA AA	42	100.00	99.02	85.71	61.90	11.90	26.20	7.32	10.19
Limited Review:									
Shelby County - Indy MSA AA	0	0.00	97.83	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2009).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS 31, 2009		Geography: RICHMOND 2010 AAS				Evaluation Period: JANUARY 1, 2007 TO DECEMBER			
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Wayne County Non MSA AA	0	0	0	\$189	0	\$189	99.00%	0	0
Limited Review:									
Shelby County - Indy MSA AA	0	0	0	\$1	0	\$1	1.00%	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2007 TO DECEMBER 31, 2009								Geography: RICHMOND 2010 AAS				Evaluation Period:					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Wayne County Non MSA AA	37.47 %	8	88.89	12.50	0.00	62.50	25.00	0	0	0	0	0	0	6.36	18.84	66.41	8.39
Limited Review:																	
Shelby Count - Indy MSA AA	3.21%	1	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	37.69	62.31	0.00

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Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System DECEMBER 31, 2009				Geography: RICHMOND 2010 AAS				Evaluation Period: JANUARY 1, 2007 TO									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																	
Wayne County Non MSA AA	37.47	8	88.89	12.50	0	62.50	25.00	7	87.50	14.29	0	71.42	14.29	6.36	18.84	66.41	8.39
Limited Review:																	
Shelby County - Indy MSA AA	3.21	1	11.11	0	0	100.00	0	1	12.50	0	0	100.00	0	0.00	37.69	62.31	0.00